

KLEINBERG, KAPLAN, WOLFF &  
COHEN, P.C.  
Matthew J. Gold  
Robert M. Tuchman  
500 Fifth Avenue  
New York, New York 10110  
Tel: (212) 986-6000

*Counsel to the State of Washington*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>In re:</b>	:	Chapter 11
	:	
<b>PURDUE PHARMA L.P., <i>et al.</i>,</b>	:	Case No. 19-23649 (SHL)
	:	(Jointly Administered)
<b>Debtors.</b>	:	
	:	
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**FOURTEENTH MONTHLY FEE STATEMENT OF  
KLEINBERG, KAPLAN, WOLFF & COHEN, P.C. AS COUNSEL TO  
THE STATE OF WASHINGTON FOR COMPENSATION FOR  
SERVICES AND REIMBURSEMENT OF EXPENSES INCURRED  
FOR THE PERIOD OF MARCH 1, 2023 THROUGH MARCH 31, 2023**

<b>Name of Applicant:</b>	Kleinberg, Kaplan, Wolff & Cohen, P.C.
<b>Provided Professional Services to:</b>	The State of Washington
<b>Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:</b>	March 10, 2022 [Docket No. 4503]
<b>Period for which compensation and reimbursement are sought:</b>	March 1, 2023 through March 31, 2023
<b>Amount of Compensation sought as actual, reasonable, and necessary:</b>	\$39,853.50
<b>Current Fee Request</b>	\$31,882.80 (80% of \$39,853.50)
<b>Amount of Expense Reimbursement sought as actual, reasonable, and necessary:</b>	\$0.22
<b>Amount of Compensation and Expenses sought as allowed under the Interim Compensation Order</b>	\$31,883.02
<b>Total Fees and Expenses Inclusive of Holdback</b>	\$39,853.72
<b>This is a(n):</b> <input checked="" type="checkbox"/> Monthly Application <input type="checkbox"/> Interim Application <input type="checkbox"/> Final Application	

Pursuant to the *Order Pursuant to 11 U.S.C. §§ 105 and 363(b) Authorizing and Approving Settlement Term Sheet* [Docket No. 4503] (the “Term Sheet Order”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals*, dated November 21, 2019 [Docket No. 529] (the “Interim Compensation Order”), Kleinberg, Kaplan, Wolff & Cohen, P.C. (“Kleinberg Kaplan”), counsel to the State of Washington in the above-captioned case, and in a related adversary proceeding and appeals, hereby submits this Fourteenth Monthly Fee Statement (the “Fee Statement”) for the period of March 1, 2023 through and including March 31, 2023 (the “Statement Period”).

**Itemization of Services Rendered and Disbursements Incurred**

Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Statement Period, with respect to each of the billing categories. As reflected in Exhibit A, Kleinberg Kaplan incurred \$39,853.50 in fees during the Statement Period. Pursuant to this Fee Statement, Kleinberg Kaplan seeks reimbursement for 80% of such fees, totaling \$31,882.80.

Annexed hereto as **Exhibit B** is a chart of Kleinberg Kaplan's professionals and paraprofessionals, including standard hourly rate for each attorney and paraprofessional who rendered services to the State of Washington and others listed above in connection with these Chapter 11 cases during the Statement Period and the title, hourly rate, aggregate hours worked and the amount of fees earned by each professional. A copy of the computer-generated time entries of Kleinberg Kaplan reflecting all time recorded, organized in the billing categories requested by the State of Washington is attached hereto as **Exhibit D**.

Attached hereto as **Exhibit C** is a chart of necessary and out-of-pocket expenses incurred by Kleinberg Kaplan in the amount of \$0.22 in connection with providing professional services prior to and during the Statement Period.

**Notice**

Kleinberg Kaplan will provide notice of the Fee Statement in accordance with the Interim Compensation Order.

Pursuant to the Interim Compensation Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, within 14 days of service of the Fee Statement, serve via email, to Kleinberg Kaplan and to the notice parties designated in the Interim Compensation Order, a written notice setting forth the precise nature of the objection and the amount at issue.

If an objection is timely served pursuant to the Interim Compensation Order, the Debtors shall be authorized and directed to pay Kleinberg Kaplan an amount equal to 80% of the fees and 100% of the expenses that are not subject to an objection. Any objection must set forth the precise nature of the objection and the amount at issue; it shall not be sufficient to simply object to all fees and expenses.

Dated: April 20, 2023

Respectfully submitted,

KLEINBERG, KAPLAN, WOLFF & COHEN, P.C.

By: /s/ Matthew J. Gold  
Matthew J. Gold  
Robert M. Tuchman

500 Fifth Avenue  
New York, New York 10110  
Tel: (212) 986-6000  
Fax: (212) 986-8866  
E-mail: [mgold@kkwc.com](mailto:mgold@kkwc.com)  
[rtuchman@kkwc.com](mailto:rtuchman@kkwc.com)

*Attorneys for the State of Washington*

**CERTIFICATE OF SERVICE**

I, Caroline James, hereby certify that, on April 20, 2023 I caused true and correct copies of the foregoing document to be served by email upon those names below:

- Jon Lowne, Perdue Pharma: [jon.lowne@pharma.com](mailto:jon.lowne@pharma.com)
- Christopher Robertson, Davis Polk & Wardwell LLP: [Christopher.robertson@davidpolk.com](mailto:Christopher.robertson@davidpolk.com)
- Dylan Consla, Davis Polk & Wardwell LLP: [dylan.consla@davispolk.com](mailto:dylan.consla@davispolk.com)
- Sara Lynne Brauner, Akin Gump Strauss Hauer & Feld LLP: [sbrauner@akingump.com](mailto:sbrauner@akingump.com)
- Arik Preis, Akin Gump Strauss Hauer & Feld LLP: [apries@akingump.com](mailto:apries@akingump.com)
- Daniel Brogan, Bayard, P.A.: [dbrogan@bayardlaw.com](mailto:dbrogan@bayardlaw.com)
- Paul Schwartzberg, Office of the United States Trustee for the Southern District of New York: [paul.schwartzberg@usdoj.gov](mailto:paul.schwartzberg@usdoj.gov)

/s/ Caroline James

Caroline James

**EXHIBIT A**  
**SERVICES RENDERED BY**  
**KLEINBERG, KAPLAN, WOLFF & COHEN, P.C.**  
**COMMENCING MARCH 1, 2023 THROUGH MARCH 31, 2023**

**Summary of Fees Task Code**

<b>Billing Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
001 Purdue Pharma	26.90	\$33,446.00
005 Fee Applications	8.20	\$6,407.50
<b>Total</b>		<b>\$39,853.50</b>
20% Fee Holdback		<b>\$7,970.70</b>
80% of Fees		<b>\$31,882.80</b>
Plus Expenses		<b>\$0.22</b>
Requested Amount		<b>\$31,883.02</b>

**EXHIBIT B**

**SERVICES RENDERED BY**

**KLEINBERG, KAPLAN, WOLFF & COHEN, P.C.**

**COMMENCING MARCH 1, 2023 THROUGH MARCH 31, 2023**

**Summary of Hours and Fees by Professional**

<b>Name of Professional</b>	<b>Position/Year Admitted to Practice/Department</b>	<b>Hourly Billing Rate</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Matthew J. Gold	Partner 1983 Bankruptcy	\$1,250	29.4	\$36,750
Robert L. Berman	Partner 1978 Securities and Corporate Finance	\$1,280	1.8	\$2,304
Ellie Taylor	Paralegal Litigation & Risk Management	\$205	3.9	\$799.50
<b>Total Fees Requested</b>				<b>\$39,853.50</b>

**EXHIBIT C**

**ACTUAL AND NECESSARY COSTS INCURRED BY  
KLEINBERG, KAPLAN, WOLFF & COHEN, P.C.  
COMMENCING MARCH 1, 2023 THROUGH MARCH 31, 2023**

<b>EXPENSE</b>	<b>AMOUNT</b>
Court Fees	\$0.22
<b>Total Expenses</b>	<b>\$0.22</b>



**EXHIBIT D**

**Time Entries for Each Professional by Task Code (Invoices)**

Kleinberg Kaplan Wolff & Cohen P.C.  
500 Fifth Avenue  
New York, NY 10110

State of Washington  
SAAG Administrator  
Email: SAAG@atg.wa.gov  
cc: Washington State Attorney General's Office  
Complex Litigation Division  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104

Invoice Date: April 18, 2023  
Invoice Number: 118850  
Matter Number: 7263-0001

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Client: State of Washington  
Matter: Purdue Pharma

*For professional services rendered through March 31, 2023*

Currency: USD

Fees 33,446.00

Costs 0.22

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**Total Due This Invoice \$33,446.22**

<b>Please Remit to:</b>	<b>Mail To:</b> Kleinberg, Kaplan, Wolff & Cohen, P.C. 500 Fifth Avenue New York, N.Y. 10110	<b>Wire Instructions:</b> Citibank N.A. ABA Number: 021000089 Swift Code: CITIUS33 (International) Account # 9987286692 <b>(Please Reference Invoice Number)</b>
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Client: State of Washington  
Matter: Purdue Pharma

Invoice Date: April 18, 2023  
Invoice Number: 118850  
Matter Number: 7263-0001

#### Time Detail

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/01/2023	Ellie Taylor	Retrieving and circulating docket updates	0.10	205.00	20.50
03/06/2023	Matthew J. Gold	Exchanging emails with team regarding SOAF issues; revising outline regarding same; reviewing Purdue funding motion	3.10	1,250.00	3,875.00
03/06/2023	Robert Berman	Reviewing and considering email from B. Eskandari regarding SOAF issues	0.50	1,280.00	640.00
03/07/2023	Matthew J. Gold	Conferring regarding SOAF issues; revising outline regarding same	1.60	1,250.00	2,000.00
03/08/2023	Matthew J. Gold	Conferring regarding SOAF issues and Intercreditor Agreement; revising outline regarding same	2.20	1,250.00	2,750.00
03/09/2023	Matthew J. Gold	Exchanging emails with J. Rupert regarding SOAF issues	0.20	1,250.00	250.00
03/09/2023	Robert Berman	Conferring regarding next steps	0.50	1,280.00	640.00
03/10/2023	Matthew J. Gold	Conferring with J. Rupert regarding SOAF issues and Intercreditor Agreement; revising outline regarding same	2.80	1,250.00	3,500.00
03/13/2023	Matthew J. Gold	Revising outline regarding SOAF issues and Intercreditor Agreement	1.20	1,250.00	1,500.00
03/14/2023	Matthew J. Gold	Revising outline regarding SOAF issues and Intercreditor Agreement	1.30	1,250.00	1,625.00
03/15/2023	Matthew J. Gold	Revising outline regarding SOAF issues and Intercreditor Agreement	0.80	1,250.00	1,000.00
03/16/2023	Matthew J. Gold	Revising outline regarding SOAF issues and Intercreditor Agreement	1.30	1,250.00	1,625.00
03/17/2023	Matthew J. Gold	Revising outline regarding SOAF issues and Intercreditor Agreement	1.20	1,250.00	1,500.00
03/20/2023	Matthew J. Gold	Reviewing hearing agenda and adversary proceeding; reviewing research regarding SOAF issues and Intercreditor Agreement	2.20	1,250.00	2,750.00
03/20/2023	Ellie Taylor	Circulating hearing agenda	0.10	205.00	20.50

Client: State of Washington  
Matter: Purdue Pharma

Invoice Date: April 18, 2023  
Invoice Number: 118850  
Matter Number: 7263-0001

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/23/2023	Matthew J. Gold	Preparing email to J. Rupert regarding SOAF issues	0.10	1,250.00	125.00
03/24/2023	Matthew J. Gold	Conferring with J. Rupert regarding SOAF issues	0.10	1,250.00	125.00
03/27/2023	Matthew J. Gold	Conferring regarding SOAF issues; preparing draft email regarding same	1.70	1,250.00	2,125.00
03/28/2023	Matthew J. Gold	Reviewing Boy Scouts confirmation challenge decision; preparing outline regarding same	1.30	1,250.00	1,625.00
03/29/2023	Matthew J. Gold	Continuing review of Boy Scouts confirmation appeal decision; revising outline regarding same	1.10	1,250.00	1,375.00
03/30/2023	Matthew J. Gold	Reviewing equitable mootness certiorari petition and stay pending appeals decision; revising outline regarding same	2.20	1,250.00	2,750.00
03/31/2023	Matthew J. Gold	Finalizing email to J. Rupert regarding SOAF issues	1.30	1,250.00	1,625.00
<b>Total</b>			<b>26.90</b>		<b>\$33,446.00</b>

#### Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Ellie Taylor	0.20	205.00	41.00
Matthew J. Gold	25.70	1,250.00	32,125.00
Robert Berman	1.00	1,280.00	1,280.00
<b>Total</b>	<b>26.90</b>		<b>\$33,446.00</b>

#### Cost Detail

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Amount</u>
03/20/2023	Bloomberg Industry Group, Inc. - Inv# 6888397446-3/6/23 Docket Track -2/1/23-2/28/23	1.00	0.22
<b>Total</b>			<b>\$0.22</b>

Kleinberg Kaplan Wolff & Cohen P.C.  
500 Fifth Avenue  
New York, NY 10110

State of Washington  
SAAG Administrator  
Email: SAAG@atg.wa.gov  
cc: Washington State Attorney General's Office  
Complex Litigation Division  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104

Invoice Date: April 18, 2023  
Invoice Number: 118850  
Matter Number: 7263-0001

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**REMITTANCE COPY**

**Purdue Pharma**

<b><u>Invoice Date</u></b>	<b><u>Invoice Number</u></b>	<b><u>Invoice Total</u></b>	<b><u>Payments</u></b>	<b><u>Balance Due</u></b>
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**Current Invoice**

04/18/2023	118850			<u>\$33,446.22</u>
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<b>Please Remit to:</b>	<b>Mail To:</b> <i>Kleinberg, Kaplan, Wolff &amp; Cohen, P.C. 500 Fifth Avenue New York, N.Y. 10110</i>	<b>Wire Instructions:</b> <i>Citibank N.A. ABA Number: 021000089 Swift Code: CITIUS33 (International) Account # 9987286692 (Please Reference Invoice Number)</i>
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Kleinberg Kaplan Wolff & Cohen P.C.  
500 Fifth Avenue  
New York, NY 10110

State of Washington  
SAAG Administrator  
Email: SAAG@atg.wa.gov  
cc: Washington State Attorney General's Office  
Complex Litigation Division  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104

Invoice Date: April 18, 2023  
Invoice Number: 118851  
Matter Number: 7263-0005

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Client: State of Washington  
Matter: Fee applications

*For professional services rendered through March 31, 2023*

Currency: USD

Fees 6,407.50

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**Total Due This Invoice \$6,407.50**

<b>Please Remit to:</b>	<b>Mail To:</b> Kleinberg, Kaplan, Wolff & Cohen, P.C. 500 Fifth Avenue New York, N.Y. 10110	<b>Wire Instructions:</b> Citibank N.A. ABA Number: 021000089 Swift Code: CITIUS33 (International) Account # 9987286692 <b>(Please Reference Invoice Number)</b>
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Client: State of Washington  
Matter: Fee applications

Invoice Date: April 18, 2023  
Invoice Number: 118851  
Matter Number: 7263-0005

#### Time Detail

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/02/2023	Robert Berman	Reviewing email and attachments regarding fee application	0.80	1,280.00	1,024.00
03/15/2023	Ellie Taylor	Preparing email regarding objection deadline for 12th Monthly Fee Statement	0.20	205.00	41.00
03/20/2023	Ellie Taylor	Reviewing Proposed Order from Davis Polk, conferring regarding the same	0.20	205.00	41.00
03/21/2023	Matthew J. Gold	Preparing for hearing; participating in hearing regarding interim fee application	1.20	1,250.00	1,500.00
03/22/2023	Matthew J. Gold	Exchanging emails with J. Rupert regarding reimbursement process	0.20	1,250.00	250.00
03/23/2023	Ellie Taylor	Updating fee statement tracker	0.10	205.00	20.50
03/27/2023	Ellie Taylor	Finalizing spreadsheet fee data; transmitting to fee examiner	0.50	205.00	102.50
03/29/2023	Matthew J. Gold	Reviewing draft monthly statement; exchanging emails regarding same	1.20	1,250.00	1,500.00
03/29/2023	Ellie Taylor	Drafting Thirteenth Monthly Fee Statement; responding to comments on the same	1.10	205.00	225.50
03/30/2023	Matthew J. Gold	Reviewing revised draft monthly statement; exchanging emails regarding same	1.10	1,250.00	1,375.00
03/30/2023	Ellie Taylor	Compiling final copy of Thirteenth Monthly Fee Statement for filing; filing and serving the same; preparing a certificate of service for the same	1.60	205.00	328.00
<b>Total</b>			<b>8.20</b>		<b>\$6,407.50</b>

#### Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Ellie Taylor	3.70	205.00	758.50
Matthew J. Gold	3.70	1,250.00	4,625.00
Robert Berman	0.80	1,280.00	1,024.00
<b>Total</b>	<b>8.20</b>		<b>\$6,407.50</b>

Kleinberg Kaplan Wolff & Cohen P.C.  
500 Fifth Avenue  
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State of Washington  
SAAG Administrator  
Email: SAAG@atg.wa.gov  
cc: Washington State Attorney General's Office  
Complex Litigation Division  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104

Invoice Date: April 18, 2023  
Invoice Number: 118851  
Matter Number: 7263-0005

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**REMITTANCE COPY**

**Fee applications**

<u>Invoice Date</u>	<u>Invoice Number</u>	<u>Invoice Total</u>	<u>Payments</u>	<u>Balance Due</u>
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Current Invoice

04/18/2023	118851			<u>\$6,407.50</u>
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<b>Please Remit to:</b>	<b>Mail To:</b> <i>Kleinberg, Kaplan, Wolff &amp; Cohen, P.C. 500 Fifth Avenue New York, N.Y. 10110</i>	<b>Wire Instructions:</b> <i>Citibank N.A. ABA Number: 021000089 Swift Code: CITIUS33 (International) Account # 9987286692 (Please Reference Invoice Number)</i>
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